

NOTICE

The official RCRA Permit file for this facility has been transferred to the California Department of Health Services under Phase II A authorization. The applicant is under no obligation to inform EPA of changes at this facility. This file may therefore be incomplete.

2/15/83

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>		I. EPA I.D. NUMBER C A D 009162116	
LABEL ITEMS I. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
II. POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS	
		YES	NO	FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
III. NAME OF FACILITY 1 SKIP AMERICAN CAN. PACKAGING, INC.					
IV. FACILITY CONTACT A. NAME & TITLE (last, first, & title) 2 BERGESON, DON MGR. IND. ENG B. PHONE (area code & no.) 415 536 2400					
V. FACILITY MAILING ADDRESS A. STREET OR P.O. BOX 3 3801 EAST 8TH STREET PO 2092 B. CITY OR TOWN 4 OAKLAND, C. STATE CA D. ZIP CODE 94604					
VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 3801 EAST 8TH STREET B. COUNTY NAME ALAMEDA C. CITY OR TOWN 6 OAKLAND D. STATE CA E. ZIP CODE 94601 F. COUNTY CODE (if known)					

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	4	1	(specify)	7		(specify)
METAL CAN MANUFACTURE							
C. THIRD				D. FOURTH			
7			(specify)	7			(specify)

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?			
AMERICAN CAN PACKAGING INC.												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)					
F - FEDERAL		M - PUBLIC (other than federal or state)		P (specify)		C		A		4 1 5		5 3 6		2 4 0 0	
S - STATE		O - OTHER (specify)													
P - PRIVATE															
E. STREET OR P.O. BOX															
3 8 0 1 EAST 8TH STREET P.O. BOX 2 0 9 2															
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
OAKLAND										C A		9 4 6 0 2		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N CA 0 0 6 0 3 3										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R CA D 0 0 9 1 6 2 1 1 6										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of metal cans and end - shearing, coating and printing of sheeted tinplate.

XIII. CERTIFICATION (see instructions)

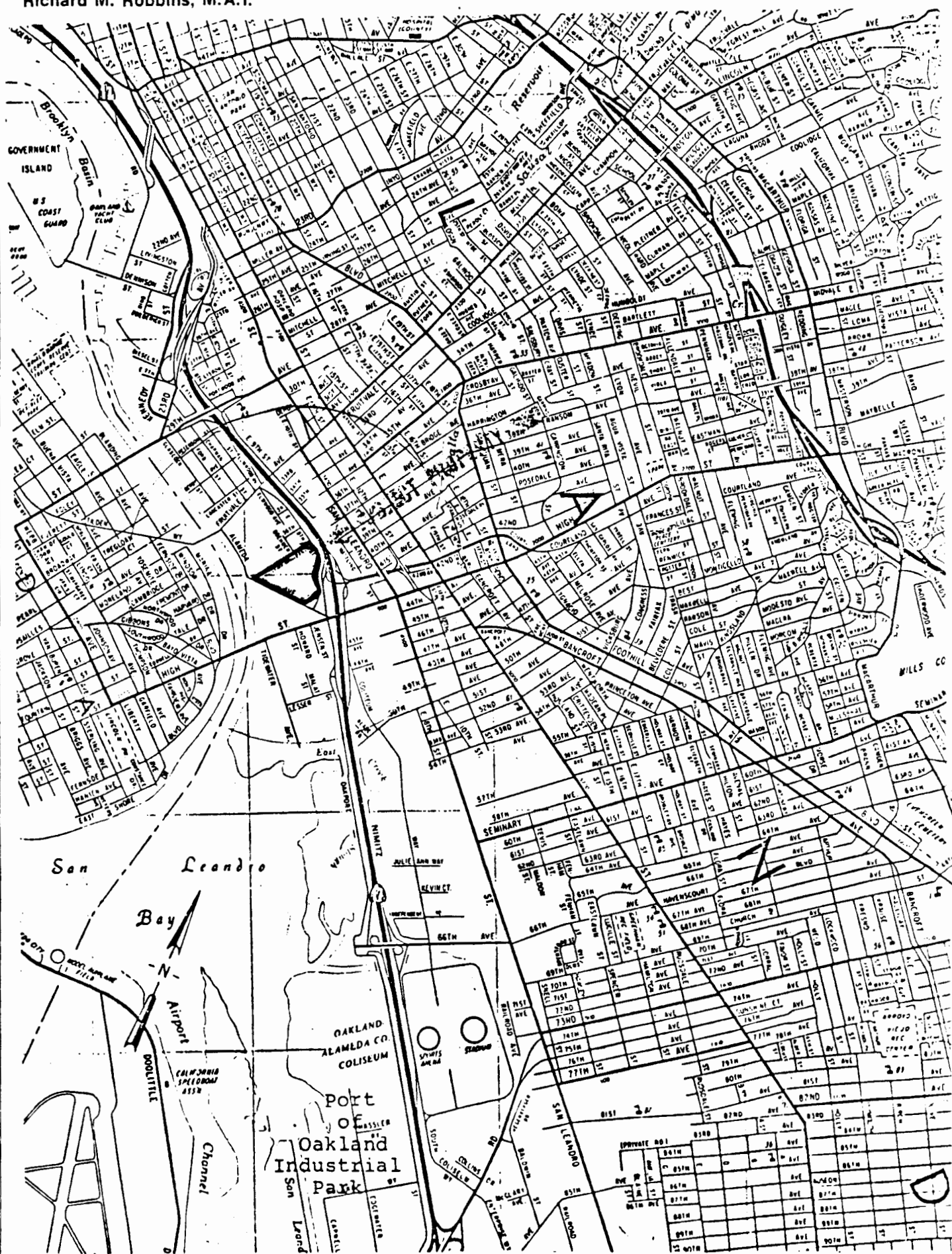
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Jack F. Hildner Vice President		10-27-86

COMMENTS FOR OFFICIAL USE ONLY

C

Richard M. Robbins, M.A.I.



Vicinity Map

FORM 3	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"> FCAD0009162116 T/A C </div>
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FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date) <input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) <div style="display: flex; justify-content: space-between;"> <div style="width:45%;"> FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left) <div style="display: flex; justify-content: space-between;"> <div style="border: 1px solid black; padding: 2px;">YR.</div> <div style="border: 1px solid black; padding: 2px;">MO.</div> <div style="border: 1px solid black; padding: 2px;">DAY</div> </div> </div> <div style="width:45%;"> <input type="checkbox"/> 2. NEW FACILITY (Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN <div style="display: flex; justify-content: space-between;"> <div style="border: 1px solid black; padding: 2px;">YR.</div> <div style="border: 1px solid black; padding: 2px;">MO.</div> <div style="border: 1px solid black; padding: 2px;">DAY</div> </div> </div> </div>	
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<input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
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III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.
 1. AMOUNT - Enter the amount.
 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> C DUP T/A C </div>									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 I	22000	G		7				
2					8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES (code "T" INCLUDE DESIGN CAPACITY.

R FOR DESCRIBING OTHER PROCESSES (code "T"

FOR EACH PROCESS ENTERED HERE

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W Z O J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE C			
W C A D 0 0 9 1 6 2 1 1 6 1													W DUP 2 DUP			
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																
W Z JZ	A. EPA HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES												
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
1	F 0 0 3	251000	P	S 0 1												
2	D 0 0 8	40000	P	S 0 1												
3	D 0 0 1	90000	P	S 0 1												
4	D 0 0 9	50	P	S 0 1												
5	U 0 1 3	100	P	S 0 1												
6	D 0 0 2	2000	P	S 0 1												
7																
8																
9																
10																
11																
12																
13																
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15																
16																
17																
18																
19																
20																
21																
22																
23																
24																
25																
26																

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

F. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)												
S												T/A C
F	C	A	D	0	0	9	1	6	2	1	1	6

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
3	7		4	5		1	2	2	1	5	
45	24		27	45		7a	-	7b	7c	7d	

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER											2. PHONE NO. (area code & no.)																																
E AMERICAN CAN PACKAGING INC.											203-552-5000																																
3. STREET OR P.O. BOX											4. CITY OR TOWN											5. ST.											6. ZIP CODE										
F AMERICAN LANE, P.O. BOX 2600											G GREENWICH											C T											06836-2600										

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

<p>A. NAME (print or type) Jack F. Hildner Vice President</p>	<p>B. SIGNATURE </p>	<p>C. DATE SIGNED 10-27-86</p>
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
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V. FACILITY DRAWING (see page 4)

#7990090

#4976389

2" PLANT WATER

STTH AVE

8" FIRE SPRINKLER

L4 PLANT SUPPLY #3765367

DESCRIPTION OF BUILDINGS

000 GAL PROPANE
THO. COATING AND
T TRUCKS

METERS

PGE-WJQM6 0550I-0

PGE-WJQ66 0540I-8

AMERICAN CAN PROPERTY

LOCATION OF GAS METERS
& STAND BY FUELS -099

② PGE-PRESS DEPT
CAN LINES &
WAREHOUSE #3

③ 099 BOILER
10" FIRE SPRINKLER
#7866033

11000 GALLONS #2 FUEL
OIL-BOILERS ONLY

① PGE-LITHO & BOILER

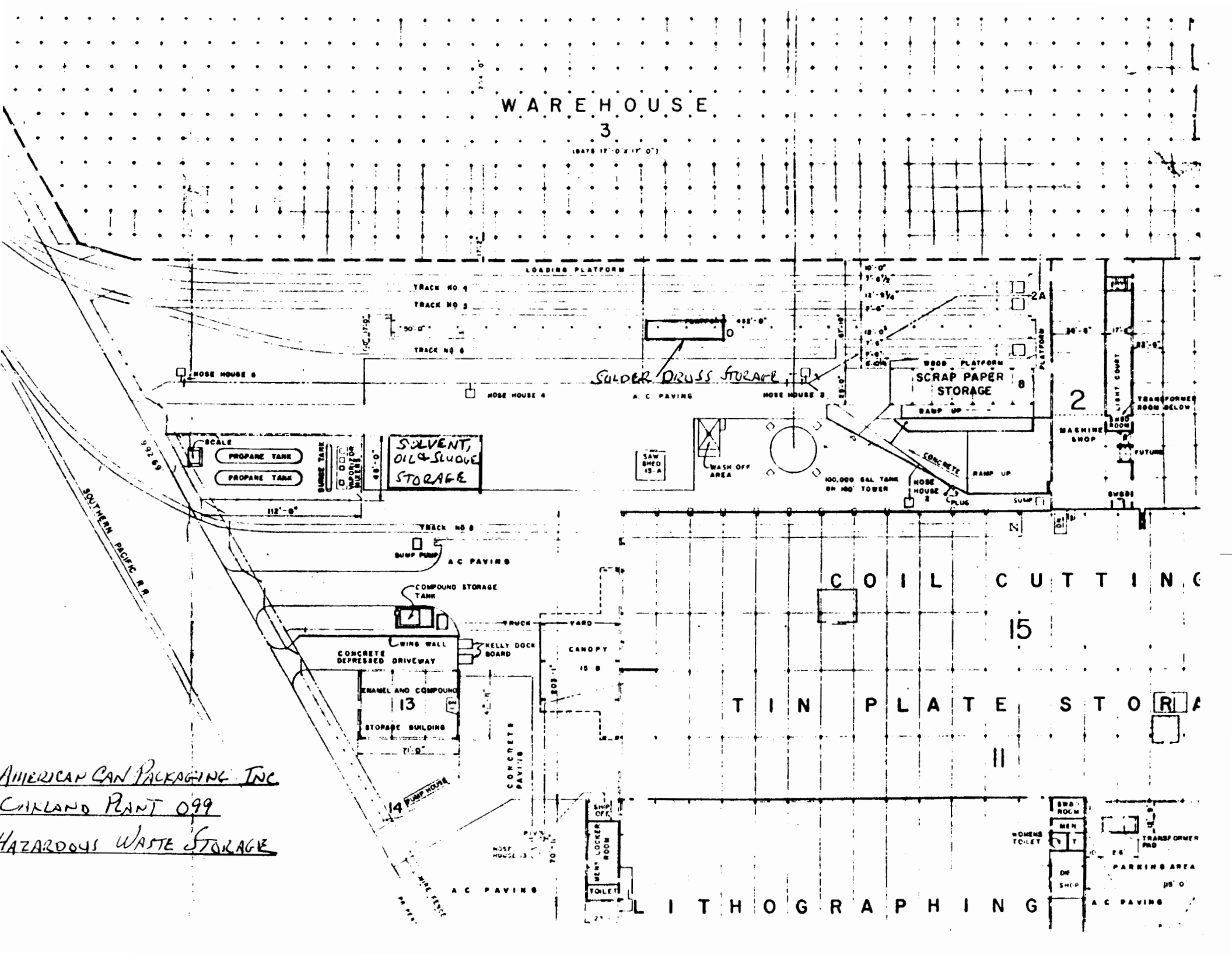
PLOT PLAN

American Can Company
OAKLAND
California

WAREHOUSE

3

(BAYS 17'-0" X 17'-0")



AMERICAN CAN PACKAGING INC
OAKLAND PLANT 099
HAZARDOUS WASTE STORAGE

FORM 1 GENERAL	 EPA	ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <small>(Read the "General Instructions" before starting.)</small>	EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;">F C A D 0 0 9 1 6 2 1 1 6 3 D</div>	
LABEL ITEMS		GENERAL INSTRUCTIONS		
I. EPA I.D. NUMBER	<div style="border: 1px solid black; padding: 20px; width: 100%;">PLEASE PLACE LABEL IN THIS SPACE</div> <div style="text-align: right; margin-top: 10px;">19 NOV 1980</div>		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME				
V. FACILITY MAILING ADDRESS				
VI. FACILITY LOCATION				
II. POLLUTANT CHARACTERISTICS				
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.				
SPECIFIC QUESTIONS		MARK 'X'	SPECIFIC QUESTIONS	
		YES NO FORM ATTACHED		
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div></div>	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		<div style="display: flex; justify-content: space-around;"><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div><div><input type="checkbox"/></div></div>	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		<div style="display: flex; justify-content: space-around;"><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div></div>	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div></div>	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input type="checkbox"/></div></div>	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	
III. NAME OF FACILITY				
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">1 SKIP</div><div style="border-bottom: 1px solid black; flex-grow: 1;">A.M.E.R.I.C.A.N. C.A.N. C.O.M.P.A.N.Y.</div></div>				
IV. FACILITY CONTACT				
A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">2</div><div style="border-bottom: 1px solid black; flex-grow: 1;">ECKMAN DICK SUPT ENGINEERING</div></div>		<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">4 1 5</div><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">5 3 6</div><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">2 4 0 0</div></div>		
V. FACILITY MAILING ADDRESS				
A. STREET OR P.O. BOX				
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">3</div><div style="border-bottom: 1px solid black; flex-grow: 1;">3 8 0 1 E A S T 8 t h S T R E E T P O 2 0 9 2</div></div>				
B. CITY OR TOWN		C. STATE	D. ZIP CODE	
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">4</div><div style="border-bottom: 1px solid black; flex-grow: 1;">O A K L A N D</div></div>		<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">C A</div></div>	<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">9 4 6 0 4</div></div>	
VI. FACILITY LOCATION				
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">5</div><div style="border-bottom: 1px solid black; flex-grow: 1;">3 8 0 1 E A S T 8 t h S T R E E T P O 2 0 9 2</div></div>				
B. COUNTY NAME				
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">A L A M E D A</div></div>				
C. CITY OR TOWN		D. STATE	E. ZIP CODE	
<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">6</div><div style="border-bottom: 1px solid black; flex-grow: 1;">O A K L A N D</div></div>		<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">C A</div></div>	<div style="display: flex; align-items: center;"><div style="border: 1px solid black; padding: 2px; margin-right: 5px;">9 4 6 0 4</div></div>	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
C	7	3	4	C	7		
15	16	17	18	15	16	17	18
(specify) Metal Can Manufacture				(specify)			
C. THIRD				D. FOURTH			
C	7			C	7		
15	16	17	18	15	16	17	18
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME		B. Is the name listed in Item VIII-A also the owner?	
C	8	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
15	16	35	
AMERICAN CAN COMPANY			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)		D. PHONE (area code & no.)	
F = FEDERAL S = STATE P = PRIVATE	M = PUBLIC (other than federal or state) O = OTHER (specify)	C	A
P		2	0
35		3	5
		5	2
		2	1
		8	1
		15	16
E. STREET OR P.O. BOX			
AMERICAN LN 1 B 9 ENVIRONMENTAL DEPT			
25		35	
F. CITY OR TOWN		G. STATE	
C	B	C	T
15	16	40	41
GREENWICH		0 6 8 3 0	
40		41 42 47 51	
IX. INDIAN LAND		Is the facility located on Indian lands?	
		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
		52	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
C	9	N	C	9	P		
15	16	17	18	15	16	17	18
CA 0006033							
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
C	9	U		C	9		
15	16	17	18	15	16	17	18
				(specify)			
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
C	9	R		C	9		
15	16	17	18	15	16	17	18
				(specify)			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of metal cans and ends - shearing, coating and printing of sheeted tin plate.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Louis F. Heeb, Vice President Corporate Environmental Programs	<i>Louis F. Heeb</i>	11-14-80

COMMENTS FOR OFFICIAL USE ONLY

C	
15	16

Form Approved OMB No. 158-S80004

FOR OFFICIAL USE ONLY									
APPLICATION APPROVED			DATE RECEIVED (yr., mo., & day)				COMMENTS		
23			24	-		29			

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)																																			
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input checked="checked" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) </div> <div style="width: 48%;"> <input type="checkbox"/> 2. NEW FACILITY (Complete item below.) </div> </div>																																			
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 5%; padding: 2px;">C</td> <td style="width: 15%; padding: 2px;">YR.</td> <td style="width: 15%; padding: 2px;">MO.</td> <td style="width: 15%; padding: 2px;">DAY</td> </tr> <tr> <td style="padding: 2px;">8</td> <td style="padding: 2px;">18</td> <td style="padding: 2px;">06</td> <td style="padding: 2px;">15</td> </tr> <tr> <td style="padding: 2px;">13</td> <td style="padding: 2px;">73 74</td> <td style="padding: 2px;">75 76</td> <td style="padding: 2px;">77 78</td> </tr> </table> <p style="margin-top: 5px;">FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)</p> </div> <div style="width: 48%;"> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 5%; padding: 2px;">C</td> <td style="width: 15%; padding: 2px;">YR.</td> <td style="width: 15%; padding: 2px;">MO.</td> <td style="width: 15%; padding: 2px;">DAY</td> </tr> <tr> <td style="padding: 2px;"></td> <td style="padding: 2px;"></td> <td style="padding: 2px;"></td> <td style="padding: 2px;"></td> </tr> <tr> <td style="padding: 2px;">13</td> <td style="padding: 2px;">73 74</td> <td style="padding: 2px;">75 76</td> <td style="padding: 2px;">77 78</td> </tr> </table> <p style="margin-top: 5px;">FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN</p> </div> </div>												C	YR.	MO.	DAY	8	18	06	15	13	73 74	75 76	77 78	C	YR.	MO.	DAY					13	73 74	75 76	77 78
C	YR.	MO.	DAY																																
8	18	06	15																																
13	73 74	75 76	77 78																																
C	YR.	MO.	DAY																																
13	73 74	75 76	77 78																																
B. REVISED APPLICATION (place an "X" below and complete Item 1 above)																																			
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS </div> <div style="width: 48%;"> <input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT </div> </div>																																			

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

- AMOUNT** — Enter the amount.
- UNIT OF MEASURE** — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A C						1																							
C		DUP																													
1 2		13 14 15																													
LINE NUMBER	A. PRO- CESS CODE <i>(from list above)</i>	B. PROCESS DESIGN CAPACITY								FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE <i>(from list above)</i>	B. PROCESS DESIGN CAPACITY								FOR OFFICIAL USE ONLY										
		1. AMOUNT <i>(specify)</i>				2. UNIT OF MEA- SURE <i>(enter code)</i>							1. AMOUNT				2. UNIT OF MEA- SURE <i>(enter code)</i>														
16 - 18 19		-				27				28				29 - 32		16 - 18 19		-				27				28				29 - 32	
X-1	S 0 2	600				G						5																			
X-2	T 0 3	20				E						6																			
1	S 0 1	22,000				G						7																			
2												8																			
3												9																			
4												10																			
16 - 18 19		-				27				28		29 - 32		16 - 18 19		-				27				28		29 - 32					

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W C A D D 2 2 9 1 6 2 1 1 6													W DUP												
1 2 13 14 15													1 2 13 14 15 23 24 25 26												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	D 0 0 1	27,000	P	S 0 1																					
2																									
3																									
4																									
5																									
6																									
7																									
8																									
9																									
10																									
11																									
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22																									
23																									
24																									
25																									
26																									

inued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

[illegible]

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

LATITUDE (degrees, minutes, & seconds)

2	7	4	0		
65	66	67	68	69	71

LONGITUDE (*degrees, minutes, & seconds*)


1	2	2	1	5			
72	-	74	75	76	77	-	79

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)												
C																											
E																											
18	16													55	56	-	58	59	-	61	62	-	65				
3. STREET OR P.O. BOX															4. CITY OR TOWN					5. ST.		6. ZIP CODE					
C													C														
F													G														
15	16													45	13	16						40	41	42	47	-	51

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Louis F. Heeb, Vice President Corporate Environmental Programs	B. SIGNATURE 	C. DATE SIGNED 11-14-80
---	---	-----------------------------------

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------

PART A RATING SHEET

FACILITY NAME: Amalwood Cdn CompanyEPA I.D. #: CA0009162116 COUNTY: 001 SCORE: 025PROCESS: 001 -----

SCORE = POINTS X WEIGHTING FACTOR

0 = Non Hazardous 99 = Imminent Hazard

AGE OF FACILITY (YEARS)

0 - 10	11 - 20	21 - 30	over 30
1 pt.	2 pt.	3 pt.	4 pt.

WEIGHTING
FACTOR

SCORE

1

4

PROCESS DESIGN CAPACITY (GAL.)

1 - 1k	1k - 10k	10k - 100k	100k - 500k	over 500k
1 pt.	2 pt.	3 pt.	4 pt.	5 pt.

2

6

PROCESS (pick worst case, add 1 point if any additional processes, then multiply by weighing factor)

- 5 pt. - landfill (D80)
- disposal in surface impoundments (D83)
- injection wells (D79)
- 4 pt. - treatment in surface impoundments (T02)
- storage in surface impoundments (S04)
- 3 pt. - land application (D81)
- underground tanks (S02)
- storage in piles (S03)
- 2 pt. - treatment in tanks or containers (T01)
- incineration (T03)
- 1 pt. - storage in tanks or containers (S01, S02)

3

3

CHARACTER OF WASTE

- 1 pt. - hazardous (D,F,K,U) — (IGNITABLES D001)
- 2 pt. - D005 - D015, D017, U021, U043, U117, U133 - U135, U223, U232
- 3 pt. - acutely hazardous (P)

4

4

LOCATION OF FACILITY

- 1 pt. - rural
- 2 pt. - urban

1

2

BEST ENGINEERING JUDGEMENT

lower hazard	1	2	3	4	5	higher hazard
--------------	---	---	---	---	---	---------------

3

6

RATIONALE FOR BEJ SCORE AND OTHER COMMENTS:

2 for ignitable wastes - facility
look clean

TOTAL SCORE = 025

RATER: Lusi JacksonDATE: 4/20/81

Part A, Permit Process --- Internal Checklist

ID Number CAD009162116 Inst Name American Can Co.

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Prm'l g Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	_____	_____	
3	Form 1 received?	_____	_____	
1	Form 3 received?	_____	_____	
1 & 3	Postmarked on or before November 19, 1980?	_____	_____	
3	Date of operation entered?	_____	_____	
3	Date of operation on or before November 19, 1980?	_____	_____	
Notif. record	Notifier?	_____	_____	
	Notified on or before August 18, 1980?	_____	_____	
1	Form 1, XIII B signed?	_____	_____	
3	Form 3, IX B Signed?	_____	_____	

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: UB)

ret 5/12

PHASE TWO

1	Unsure if regulated or non-regulated?	_____	_____
3	New facility?	_____	_____
1 & 3	Core items missing? If Yes, indicate which items: Facility name____; location____; mail address____; operator info____; certification____; process info____; waste info <u>process</u> ____; owner____; sigs____.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps____; photos____; drawings____; lat/long____. Other observations and comments:
-------	--

Received Date Stamp

19 NOV 1980

(Stamp forms also)

Log out/Log in
on reverse side,

MAINTENANCE SCREEN SELECTION MENU

ENTER OPTION: **

C1 : CARD C1 - PROCESS CODE / AMOUNT / UNIT
PC : CARD PC - FACILITY COMMENTS
P2 : CARD P2 - FACILITY NAME / INDICATORS / FREE FIELDS
P7 : CARD P7 - SITE INDUSTRIAL CLASSIFICATION CODES
P9 : CARD P9 - PERMIT TYPE AND PERMIT NUMBER
W1 : CARD W1 - HAZARDOUS WASTE CODE / AMOUNT / UNIT
W2 : CARD W2 - HAZARDOUS WASTE CODE AND PROCESS
OT : CARD OT - P1 / P6 / P8 / P9 / P0 / ALIAS MAINTENANCE
EX : EXIT MAINTENANCE MENU SCREEN BACK TO MAIN MENU

MAINTENANCE SCREEN CARD P2

FACILITY ID: -----

FACILITY CONTACT NAME/POSITION : -----
CONTACT TELEPHONE NUMBER : (---) --- ---
MODIFICATION UNDER CONSTRUCTION: -
COMMERCIAL FACILITY INDICATOR: -
NON - REG. FACILITY INDICATOR: -

REGION FLAG : -
REGIONAL ELEMENTS 1: - 2: - 3: - 4: - 5: -

FINANCIAL TICKER: ----- STATE AUTH. INDICATOR: -

MAINTENANCE SCREEN CARD W1

FACILITY ID: -----

NEW: Put the codes under WASTE CODE.
WASTE: Put the old code under the WASTE CODE, and put the
new code under the NEW WASTE CODE.
WASTE: Put the codes under WASTE CODE, and put a "0" under
the NEW WASTE CODE.

INDEX	WASTE CODE	WASTE CODE	NEW WASTE AMOUNT	WASTE UNIT
	----	----	-----	-
	----	----	-----	-
	----	----	-----	-

MAINTENANCE SCREEN CARD P1 / P6 / P8 / P9 / P0 / ALIAS

FACILITY ID: CAD009162116

(P1) NOTIF. CONFIDENTIALITY: -
PART-A CONFIDENTIALITY: -
CLOSURE DATE : -----

(P9) MAP INDICATOR : -
NATURE OF BUSINESS : -

(P6) DISTRICT CODE : -
RIVER BASIN CODE : -----

(P0) NOTIF. ACKNOW DATE : -----
INTERIM STATUS DATE : -----
INTERIM STATUS DATE 2 : -----

(P8) OWNER TYPE : -
RCRA PERMIT STATUS : ----- **(2)**

(AL) ALIAS NAME : -----

Change Data Entered

Initials

Date

(2)

RCRA NOTIFICATION MAINTENANCE FORM

FACILITY ID : CAD 009162 116

(F2) CONTACT PERSON/TITLE : _____

CONTACT PHONE NUMBER : _____

(F3) FACIL MAILING ADDRESS : _____

(F4) MAILING CITY : _____ STATE _____ ZIP _____

(F8) HAZ WASTE ACTIVITY : ENTER "X" FOR ADD/ "\$" FOR DELETE

ACTIVITY CODE : GEN__ TRANS__ TSD__ UNC__

TRANSPORT MODE : AIR__ RAIL__ HIGHWAY__ WATER__

OTHER__

(OA) FACILITY OWNER NAME : _____

(OT) C303 CODE : _____

C1105 CODE : (5)

ADD : _____

CHANGE : ☒

DELETE : _____

DATE : 7, 22

INITIAL : mn

**RECORDS
SEPARATOR
PAGE**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

December 7, 1999

**OFFICE OF THE
REGIONAL ADMINISTRATOR**

**CERTIFIED MAIL RECEIPT NO. Z 387 950 295
RETURN RECEIPT REQUESTED**

In Reply, Refer to WST-3

Mr. John Sneed
Vice President and Group Leader
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Subject: Termination of Letter of Credit SDC-743-001488
American Can Company, Oakland, California

Dear Mr. Sneed:

On February 13, 1995, the United States Environmental Protection Agency (EPA), Region 9, sent a letter to the American National Can Company authorizing release of Letter of Credit (LOC) SDC-743-001488, dated April 26, 1988 (Enclosure 1). This LOC was issued by your bank to the American National Can Company of Chicago, Illinois, for their facility in Oakland, California (Enclosure 2). The Regional Administrator of EPA Region 9 was listed as the beneficiary.

On April 11, 1995, the California Department of Toxic Substances Control (DTSC) sent a letter to the Dai-Chi Kangyo Bank, Ltd., stating that it was returning the LOC SDC-743-001488 (Enclosure 3). The LOC was being replaced by LOC SDC-743-002816 with DTSC as the beneficiary.

In October of this year, Gary Silha, Director of Treasury Operations, American National Can Company, contacted EPA Region 9. Mr. Silha stated that neither the bank nor American National Can Company ever received the original LOC SDC-743-001488 which was thought to have been included in the April 1995 letter by DTSC to the Dai-chai Kangyo Bank. Mr. Silha stated that the letter had included a photocopy of the LOC and not the original. EPA Region 9 has searched our files and we were unable to locate the original LOC. The DTSC has searched their files and also was not able to locate the original LOC.

Z 387 950 295

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>John Speed</i>	
The Dai-ichi Kangyo Bank Ltd.	
Street & Number <i>Chicago Branch</i>	
<i>108 South Wacker Dr., 3000</i>	
Post Office, State, & ZIP Code	
<i>Chicago, IL 60606</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800 April 1995

Therefore, the EPA is again authorizing the release of LOC SDC-743-001488 (Enclosure 1). Since the original LOC has not been located and has been replaced with SDC-743-002816, the EPA authorizes the cancellation of LOC SDC-743-001488. This authorization of cancellation provides clarification that the EPA does not intend to draw on LOC SDC-743-001488.

Furthermore, during the EPA file search, we located an original amendment to LOC SDC-743-001488 dated April 21, 1989. Since the cancellation of LOC SDC-743-001488 is being approved, we are enclosing the original amendment (Enclosure 4) with this letter.

If you have any questions regarding this matter, please contact M. Kim Savage of my staff at (415) 744-2097.

Yours,


for Felicia Marcus
Regional Administrator

enclosures

cc: Sue Laney
Department of Toxic Substances Control
10151 Croydon Way, Suite 3
Sacramento, CA 95827-2106

Marvel Bradshaw
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Gary Silha
Director of Treasury Operations
American National Can Company
8770 W. Bryn Mawr Avenue - Mail Suite 10-G
Chicago, IL 60631-3542

Enclosure 1

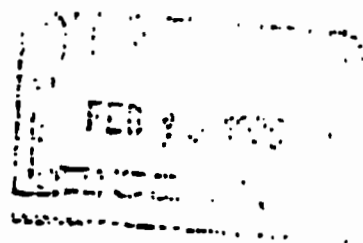


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

FEB 13 1995



Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631

Re: EPA's Release of Letter of Credit No. SDC-743-001488

Dear Mr. Moran:

This letter is in response to a request from Deborah McDowell, Financial Responsibility Coordinator, California Department of Toxic Substances Control (DTSC), that the United States Environmental Protection Agency (EPA) authorize the release of letter of credit number SDC-743-001488. This letter of credit was issued on April 26, 1988 by the Dai-Chi Kangyo Bank, Ltd, to provide ~~financial assurance for closure of American Can Packaging, Inc.,~~ EPA ID No. CAD 009 162 116, and cites U. S. EPA as beneficiary.

On August 1, 1992, EPA granted final authorization to the State of California, Environmental Protection Agency, DTSC, to operate the State's hazardous waste program, subject to the authority retained by EPA in accordance with the Hazardous and Solid Waste Amendments of 1984 (HSWA) [Federal Register, Vol. 57, No. 143, Thursday, July 23, 1992, pgs. 42726-32730 enclosed].


Thus, RCRA financial responsibility mechanisms required under 40 Code of Federal Regulations 264/265 Subpart H and the California Code of Regulations 66264/66265 Title 22, Article 8, must now be payable to the Department of Toxic Substances Control (Department) rather than to the EPA Regional Administrator.

Accordingly, EPA authorizes the release and return to your office of letter of credit number SDC-743-001488, with the understanding that it shall be immediately replaced with an alternative mechanism of equal or greater value.

LC submitted 4/26/88

If you have any questions regarding the above, please do not hesitate to call me at (415) 744-2090 or Elaine Schimmel of my staff at (415) 744-2146.

Sincerely,


Richard E. Vaille
Chief
Waste Compliance Branch

Enclosure

cc: Deborah McDowell, DTSC-HQ16, Sacramento, w/o enc.

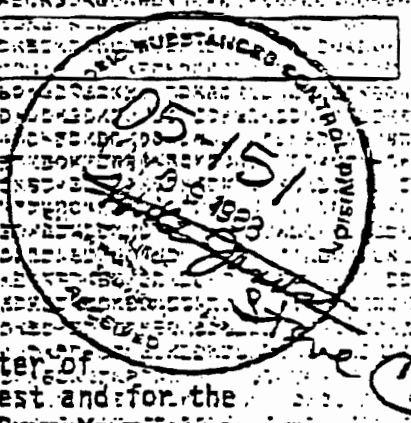
Enclosure 2

PERSON CHECKED BY: [illegible] DATE: [illegible]
 BANK OF AMERICA NATIONAL ASSOCIATION

PERSON CHECKED BY: [illegible] DATE: [illegible]
 BANK OF AMERICA NATIONAL ASSOCIATION

PERSON CHECKED BY: [illegible] DATE: [illegible]
 BANK OF AMERICA NATIONAL ASSOCIATION

DATE: APRIL 26, 1988 CREDIT NO. SDC-743-001488
 REGIONAL ADMINISTRATOR REGION IX UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



Dear Sir or Madam: We hereby establish our Irrevocable Standby Letter of Credit No. SDC-743-001488 in your favor, at the request and for the account of AMERICAN NATIONAL CAN COMPANY, 8770 West Bryn Mawr Avenue, Chicago, Illinois 60631-3504, up to the aggregate amount of Twenty-five Thousand Two Hundred Ninety-nine U.S. Dollars (\$25,299.00), available upon presentation by any one of you of your sight draft, bearing reference to this letter of credit No. SDC-743-001488, and your signed statement reading as follows:

"I hereby certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended."

This letter of credit is effective as of April 26, 1988, and shall expire on April 26, 1989, but such expiration date shall be automatically extended for a period of 1 year on April 26th and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and American National Can Company by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and American National Can Company, as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of American National Can Company in accordance with your instructions.

We certify that the wording of this letter of credit is identical to the wording specified in 40 CFR 264.151 (d) as such regulations were constituted on the date shown immediately below.

This credit is subject to the Uniform Customs and Practice for Documentary Credits (1983) Revision, ICC publication 400.

Christina Welsh
 Christina Welsh
 The Dai-Ichi Kangyo Bank, Ltd., Chicago
 April 26, 1988

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
 DATE 10/12/88 BY [illegible]

Enclosure 3

April 11, 1995

Mr. Brian W. Riley
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Dear Mr. Riley:

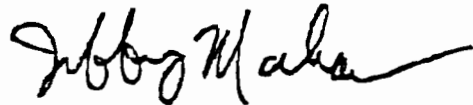
This is a transmittal letter which is accompanying letter of credit number SDC-743-001488, dated April 26, 1988. The letter of credit has The Dai-Chi Kangyo Bank, Ltd. specified as the issuer and the United States Environmental Protection Agency (U.S. EPA) specified as the beneficiary. Mr. Richard E. Vaille, Chief of the Waste Compliance Branch for Region IV of U.S. EPA recently sent you a letter approving the release of the letter of credit, copy enclosed.

American National Can Company has replaced letter of credit number SDC-743-001488 with letter of credit number SDC-743-002816 in the amount of \$100,000 dated January 17, 1995, issued by The Dai-Chi Kangyo Bank, Ltd. and the Department of Toxic Substances Control (DTSC) is specified as the beneficiary on the new letter of credit. Therefore, DTSC is returning letter of credit number SDC-743-001488.

If you have any questions, please contact Ms. Deborah McDowell of my staff at (916) 323-8325.

Sincerely,

*THE ATTACHMENT TO THIS LETTER
WAS A XEROX OF THE LC INSTEAD
OF THE ORIGINAL LC.*



Mr. Jeffrey Mahan, Chief
Audits, Financial Responsibility, and
Special Investigations Unit

Enclosures
Certification No: P 806 024 729
cc: (next page)



American National Can Co. any

April 11, 1995

Page 2

cc: Ms. Elaine Schimmel (H 4-1)
U.S. EPA - Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois, 60631

Ms. Kristen Bretz
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Patti Barni, Chief
DTSC-Statewide Compliance Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Enclosure 4

DATE APRIL 21, 1989	CREDIT NO. SDC-743-001488
-------------------------------	-------------------------------------

AMENDMENT TO IRREVOCABLE STANDBY LETTER OF CREDIT**TO: REGIONAL ADMINISTRATOR****UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****REGION IX****215 FREMONT STREET****SAN FRANCISCO, CA. 94105****APPLICANT: AMERICAN NATIONAL CAN COMPANY****8770 WEST BRYN MAWR AVENUE****CHICAGO, ILL. 60631****RA/DRA****Action****CC:****File:****GENTLEMEN:****THE ABOVE MENTIONED CREDIT HAS BEEN AMENDED AS FOLLOWS.**

THE AMOUNT WILL BE INCREASED BY \$858.00 EFFECTIVE APRIL 21, 1989
MAKING THE NEW AVAILABLE BALANCE \$26,157.00.

VERY TRULY YOURS,**THE DAI-ICHI KANGYO BANK LTD., CHICAGO BRANCH****AUTHORIZED SIGNATURE**

EXCEPT IN SO FAR AS OTHERWISE EXPRESSLY STATED,
THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS
AND PRACTICE FOR DOCUMENTARY CREDITS (1983)
REVISION, ICC PUBLICATION #00.

XX
XX
XX

()

12/1/99

CERTIFIED MAIL RECEIPT NO. Z 387 950 295
RETURN RECEIPT REQUESTED

In Reply, Refer to WST-3

Mr. John Sneed
Vice President and Group Leader
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Subject: Termination of Letter of Credit SDC-743-001488
American Can Company, Oakland, California

Dear Mr. Sneed:

On February 13, 1995, the United States Environmental Protection Agency (EPA), Region 9, sent a letter to the American National Can Company authorizing release of Letter of Credit (LOC) SDC-743-001488, dated April 26, 1988 (Enclosure 1). This LOC was issued by your bank to the American National Can Company of Chicago, Illinois, for their facility in Oakland, California (Enclosure 2). The Regional Administrator of EPA Region 9 was listed as the beneficiary.

On April 11, 1995, the California Department of Toxic Substances Control (DTSC) sent a letter to the Dai-Chi Kangyo Bank, Ltd., stating that it was returning the LOC SDC-743-001488 (Enclosure 3). The LOC was being replaced by LOC SDC-743-002816 with DTSC as the beneficiary.

In October of this year, Gary Silha, Director of Treasury Operations, American National Can Company, contacted EPA Region 9. Mr. Silha stated that neither the bank nor American National Can Company ever received the original LOC SDC-743-001488 which was thought to have been included in the April 1995 letter by DTSC to the Dai-chai Kangyo Bank. Mr. Silha stated that the letter had included a photocopy of the LOC and not the original. EPA Region 9 has searched our files and we were unable to locate the original LOC. The DTSC has searched their files and also was not able to locate the original LOC.

Therefore, the EPA is again authorizing the release of LOC SDC-743-001488 (Enclosure 1). Since the original LOC has not been located and has been replaced with SDC-743-002816, the EPA authorizes the cancellation of LOC SDC-743-001488. This authorization of cancellation provides clarification that the EPA does not intend to draw on LOC SDC-743-001488.

Furthermore, during the EPA file search, we located an original amendment to LOC SDC-743-001488 dated April 21, 1989. Since the cancellation of LOC SDC-743-001488 is being approved, we are enclosing the original amendment (Enclosure 4) with this letter.

If you have any questions regarding this matter, please contact M. Kim Savage of my staff at (415) 744-2097.

Yours,

for *HTW* *2 dec 89*
for Felicia Marcus
Regional Administrator

enclosures

cc: Sue Laney
Department of Toxic Substances Control
10151 Croydon Way, Suite 3
Sacramento, CA 95827-2106

Marvel Bradshaw
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Gary Silha
Director of Treasury Operations
American National Can Company
8770 W. Bryn Mawr Avenue - Mail Suite 10-G
Chicago, IL 60631-3542

Enclosure 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

FEB 13 1995

FEB 13 1995
RECEIVED

Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631

Re: EPA's Release of Letter of Credit No. SDC-743-001488

Dear Mr. Moran:

This letter is in response to a request from Deborah McDowell, Financial Responsibility Coordinator, California Department of Toxic Substances Control (DTSC), that the United States Environmental Protection Agency (EPA) authorize the release of letter of credit number SDC-743-001488. This letter of credit was issued on April 26, 1988 by the Dai-Chi Kangyo Bank, Ltd, to provide ~~financial assurance for closure of American Can Packaging, Inc.,~~ EPA ID No. CAD 009 162 116, and cites U. S. EPA as beneficiary.

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Thus, RCRA financial responsibility mechanisms required under 40 Code of Federal Regulations 264/265 Subpart H and the California Code of Regulations 66264/66265 Title 22, Article 8, must now be payable to the Department of Toxic Substances Control (Department) rather than to the EPA Regional Administrator.

Accordingly, EPA authorizes the release and return to your office of letter of credit number SDC-743-001488, with the understanding that it shall be immediately replaced with an alternative mechanism of equal or greater value.

LCC submitted 4/26/88

If you have any questions regarding the above, please do not hesitate to call me at (415) 744-2090 or Elaine Schimmel of my staff at (415) 744-2146.

Sincerely,


Richard E. Vaille
Chief
Waste Compliance Branch

Enclosure

cc: Deborah McDowell, DTSC-HQ16, Sacramento, w/o enc.

Enclosure 2

DATE: APRIL 26, 1988

CREDIT NO.

SDC-743-001488

Regional Administrator
Region IX
United States Environmental Protection Agency

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of

Credit No. SDC-743-001488 in your favor, at the request and for the

account of AMERICAN NATIONAL CAN COMPANY, 8770 West Bryn Mawr

Avenue, Chicago, Illinois 60631-3504, up to the aggregate amount

of Twenty-five Thousand Two Hundred Ninety-nine U.S. Dollars

(\$25,299.00), available upon presentation by any one of you of

your sight draft, bearing reference to this letter

of credit No. SDC-743-001488, and

2. your signed statement reading as follows:

"I hereby certify that the amount of the draft is payable pursuant to

regulations issued under authority of the Resource Conservation

and Recovery Act of 1976 as amended."

This letter of credit is effective as of April 26, 1988, and shall expire on April 26, 1989, but such

expiration date shall be automatically extended for a period of

1 year on April 26th and on each successive expiration

date, unless, at least 120 days before the current expiration

date, we notify both you and American National Can Company by

certified mail that we have decided not to extend this letter of

credit beyond the current expiration date. In the event you are

so notified, any unused portion of the credit shall be available

upon presentation of your sight draft for 120 days after the date

of receipt by both you and American National Can Company, as

shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in

compliance with the terms of this credit, we shall duly honor

such draft upon presentation to us, and we shall deposit the

amount of the draft directly into the standby trust fund of

American National Can Company in accordance with your instructions.

We certify that the wording of this letter of credit is

identical to the wording specified in 40 CFR 264.151 (d) as such

regulations were constituted on the date shown immediately below.

This credit is subject to the Uniform Customs and Practice

for Documentary Credits (1983) Revision, ICC publication 400.

— () —

Christina Welsh

The Dai-Ichi Kangyo Bank, Ltd., Chicago

April 26, 1988

FORM 1-12 (1 OF 5)

Enclosure 3

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P Street, 4th Floor

P.O. Box 806

Sacramento, CA 95812-0806

(916) 322-5169



April 11, 1995

Mr. Brain W. Riley
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Dear Mr. Riley:

This is a transmittal letter which is accompanying letter of credit number SDC-743-001488, dated April 26, 1988. The letter of credit has The Dai-Chi Kangyo Bank, Ltd. specified as the issuer and the United States Environmental Protection Agency (U.S. EPA) specified as the beneficiary. Mr. Richard E. Vaille, Chief of the Waste Compliance Branch for Region IV of U.S. EPA recently sent you a letter approving the release of the letter of credit, copy enclosed.

American National Can Company has replaced letter of credit number SDC-743-001488 with letter of credit number SDC-743-002816 in the amount of \$100,000 dated January 17, 1995, issued by The Dai-Chi Kangyo Bank, Ltd. and the Department of Toxic Substances Control (DTSC) is specified as the beneficiary on the new letter of credit. Therefore, DTSC is returning letter of credit number SDC-743-001488.

If you have any questions, please contact Ms. Deborah McDowell of my staff at (916) 323-8325.

Sincerely,

THE ATTACHMENT TO THIS LETTER
WAS A XEROX OF THE L/C INSTEAD
OF THE ORIGINAL L/C.

Mr. Jeffrey Mahan, Chief
Audits, Financial Responsibility, and
Special Investigations Unit

Enclosures

Certification No: P 806 024 729

cc: (next page)



AMERICAN NATIONAL CAN COMPANY

April 11, 1995

Page 2

cc: Ms. Elaine Schimmel (H 4-1)
U.S. EPA - Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois, 60631

Ms. Kristen Bretz
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Patti Barni, Chief
DTSC-Statewide Compliance Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Enclosure 4

DATE APRIL 21, 1989	CREDIT NO. SDC-743-001488
------------------------	------------------------------

AMENDMENT TO IRREVOCABLE STANDBY LETTER OF CREDIT

TO: REGIONAL ADMINISTRATOR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 FREMONT STREET
SAN FRANCISCO, CA. 94105

APPLICANT: AMERICAN NATIONAL CAN COMPANY
8770 WEST BRYN MAWR AVENUE
CHICAGO, ILL. 60631

RA/DRA	4/28
Action	T-2
CC:	
File:	

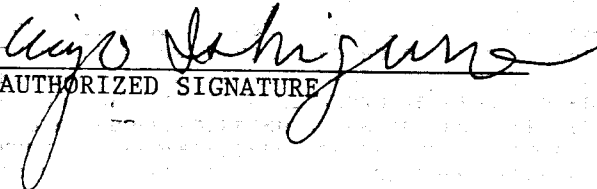
GENTLEMEN:

THE ABOVE MENTIONED CREDIT HAS BEEN AMENDED AS FOLLOWS.

THE AMOUNT WILL BE INCREASED BY \$858.00 EFFECTIVE APRIL 21, 1989
MAKING THE NEW AVAILABLE BALANCE \$26,157.00.

VERY TRULY YOURS,

THE DAI-ICHI KANGYO BANK LTD., CHICAGO BRANCH


AUTHORIZED SIGNATURE

EXCEPT IN SO FAR AS OTHERWISE EXPRESSLY STATED,
THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS
AND PRACTICE FOR DOCUMENTARY CREDITS (1983)
REVISION, ICC PUBLICATION 400.

XX
XX
XX

— () —

RECORD OF COMMUNICATION

TO:
Kim Savage
WST-3

FROM:
Gary Silha, Dir. Treasury Operations
American Nat'l Can Co

DATE:
10/12/99 & 11/3/99

SUBJECT: Letter of Credit SDC-743-001488, American National Can Company
American Can Company, Oakland, California

SUMMARY OF COMMUNICATIONS:

Mr. Silha contacted me for assistance. Both EPA and DTSC had released, in 1995, a Letter of Credit (SDC-743-001499) which had EPA as the beneficiary. DTSC's letter stated "DTSC is returning letter of credit number SDC-743-001488." However, Mr. Silha stated that neither the Dai-Chi Kangyo Bank, Ltd. nor the American National Can Company ever received the original of the LOC. Mr. Silva asked that I attempt to locate the original and return it to the bank. This LOC has been replaced by another LOC with DTSC as the beneficiary.

I contacted both the HQ and Berkeley offices of DTSC. After searching through their files and the safe they could not locate the original. I have searched through the EPA files and found an original of an amendment to said LOC, but not the original LOC.

Mr. Silha and I talked again and it was determined that a letter was necessary to the bank so that the bank could cancel the LOC. According to Mr. Silha, the letter should state that the original could not be located, attach a photocopy, allow the cancellation and state that EPA will not draw upon this LOC (this is okay since they have replaced the LOC with another for compliance with the FA requirements).

I told Mr. Silha that I would send a letter to the bank.

CONCLUSIONS, ACTION TAKEN OR REQUIRED:

EPA will send a letter to the bank stating that the original could not be located, enclose a photocopy, allow cancellation and state that EPA will not draw upon the LOC.

FAX TRANSMISSION

AMERICAN NATIONAL CAN COMPANY
8770 W. Bryn Mawr Avenue - Mail Suite 10G
Chicago, Illinois 60631-3542
773-399-3145
Fax: 773-399-3115

Date: 10-13-99
To: Kim Savage
From: Gary A. Silha
Director of Treasury Operations
Subject: CANCELLED L/C
Pages: 6, including this cover sheet.
Fax No.: 415-744-1044

COMMENTS:

Kim,

I APPRECIATE YOUR HELP. PLEASE CALL ME AT 773-399-3145
IF YOU ARE ABLE TO SOLVE THIS MYSTERY.

THANKS.

GARY A SILHA

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

400 P Street, 4th Floor

P.O. Box 806

Sacramento, CA 95812-0806

(916) 322-5169



April 11, 1995

Mr. Brian W. Riley
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

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If you have any questions, please contact Ms. Deborah McDowell of my staff at (916) 323-8325.

Sincerely,

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WAS A XEROX OF THE L/C INSTEAD
OF THE ORIGINAL L/C.

Mr. Jeffrey Mahan, Chief
Audits, Financial Responsibility, and
Special Investigations Unit

Enclosures
Certification No: P 806 024 729
cc: (next page)



American National Can Company
April 11, 1995
Page 2

cc: Ms. Elaine Schimmel (H 4-1)
U.S. EPA - Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois, 60631

Ms. Kristen Bretz
The Dai-Chi Kangyo Bank, Ltd.
Chicago Branch
10 South Wacker Drive, 26th Floor
Chicago, Illinois 60606

Patti Barni, Chief
DTSC-Statewide Compliance Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710



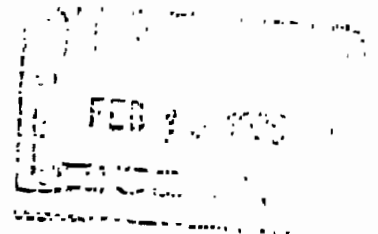
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

FEB 13 1995



Mr. Joseph S. Moran
Assistant General Counsel - Environmental
American Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631

Re: EPA's Release of Letter of Credit No. SDC-743-001488

Dear Mr. Moran:

This letter is in response to a request from Deborah McDowell, Financial Responsibility Coordinator, California Department of Toxic Substances Control (DTSC), that the United States Environmental Protection Agency (EPA) authorize the release of letter of credit number SDC-743-001488. This letter of credit was issued on April 26, 1988 by the Dai-Chi Kangyo Bank, Ltd, to provide ~~financial assurance for closure of American Can Packaging, Inc.,~~ EPA ID No. CAD 009 162 116, and cites U. S. EPA as beneficiary.


On August 1, 1992, EPA granted final authorization to the State of California, Environmental Protection Agency, DTSC, to operate the State's hazardous waste program, subject to the authority retained by EPA in accordance with the Hazardous and Solid Waste Amendments of 1984 (HSWA) [Federal Register, Vol. 57, No. 143, Thursday, July 23, 1992, pgs. 42726-32730 enclosed].

Thus, RCRA financial responsibility mechanisms required under 40 Code of Federal Regulations 264/265 Subpart H and the California Code of Regulations 66264/66265 Title 22, Article 8, must now be payable to the Department of Toxic Substances Control (Department) rather than to the EPA Regional Administrator.

Accordingly, EPA authorizes the release and return to your office of letter of credit number SDC-743-001488, with the understanding that it shall be immediately replaced with an alternative mechanism of equal or greater value.

If you have any questions regarding the above, please do not hesitate to call me at (415) 744-2090 or Elaine Schimmel of my staff at (415) 744-2146.

Sincerely,


Richard E. Vaille
Chief
Waste Compliance Branch

Enclosure

cc: Deborah McDowell, DTSC-HQ16, Sacramento, w/o enc.

111 S. Wabash Avenue, Chicago, Illinois 60603
Phone: 312/782-5400 Telex: 25-4515

DATE: APRIL-26, 1988

CREDIT NO.
SDC-743-001488Regional Administrator
Region IX
United States Environmental Protection Agency

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. SDC-743-001488 in your favor, at the request and for the account of AMERICAN NATIONAL CAN COMPANY, 8770 West Bryn Mawr Avenue, Chicago, Illinois 60631-3504, up to the aggregate amount of Twenty-five Thousand Two Hundred Ninety-nine U.S. Dollars (\$25,299.00), available upon presentation by any one of you of:

1. your sight draft, bearing reference to this letter of credit No. SDC-743-001488, and
2. your signed statement reading as follows: "I hereby certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended."

This letter of credit is effective as of April 26, 1988, and shall expire on April 26, 1989, but such expiration date shall be automatically extended for a period of 1 year on April 26th and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and American National Can Company by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and American National Can Company, as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of American National Can Company in accordance with your instructions.

We certify that the wording of this letter of credit is identical to the wording specified in 40 CFR 264.151 (d) as such regulations were constituted on the date shown immediately below.

This credit is subject to the Uniform Customs and Practice for Documentary Credits (1983) Revision, ICC publication 400.

Christina Welsh
The Dai-Ichi Kangyo Bank, Ltd., Chicago
April 26, 1988



DATE APRIL 21, 1989	CREDIT NO. SDC-743-001488
------------------------	------------------------------

AMENDMENT TO IRREVOCABLE STANDBY LETTER OF CREDIT

TO: REGIONAL ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 FREMONT STREET
SAN FRANCISCO, CA. 94105

APPLICANT: AMERICAN NATIONAL CAN COMPANY
8770 WEST BRYN MAWR AVENUE
CHICAGO, ILL. 60631

RA/DRA

4/28

Action

T-2

CC:

File:

GENTLEMEN:

THE ABOVE MENTIONED CREDIT HAS BEEN AMENDED AS FOLLOWS.

THE AMOUNT WILL BE INCREASED BY \$858.00 EFFECTIVE APRIL 21, 1989
MAKING THE NEW AVAILABLE BALANCE \$26,157.00.

VERY TRULY YOURS,

THE DAI-ICHI KANGYO BANK LTD., CHICAGO BRANCH

AUTHORIZED SIGNATURE

EXCEPT IN SO FAR AS OTHERWISE EXPRESSLY STATED,
THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS
AND PRACTICE FOR DOCUMENTARY CREDITS (1983)
REVISION, ICC PUBLICATION 400.

XX
DOCUMENTARY CREDITS (1983) REVISION XX
XX



March 30, 1989

Regional Administrator
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Sirs:

In accordance with the requirements of 40 C.F.R. Part 265, American National Can Company hereby submits the enclosed documents which satisfy the financial assurance requirements:

1. Letter from the Chief Financial Officer
2. Letter from Touche Ross & Co.
3. Audited Financial Statements of American National Can Company for the period ended December 31, 1988.

Any questions related to the enclosed documents may be referred to Richard A. Kabaker, Esq. (312-399-3526) of this office, or to Maria Lubinski Ciokajlo, Esq., of Cadwalader, Wickersham & Taft, 100 Maiden Lane, New York, NY 10038 (212-504-6766).

Very truly yours,

A handwritten signature in cursive script, reading "Kristine K. Partain".

Kristine K. Partain
Financial Analyst

KKP174/amd

Enclosures

cc: R. Kabaker - ANCC
M. Lubinski - Cadwalader



COMPANY CONFIDENTIAL

March 28, 1989

Regional Administrator
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Sir:

I am the Chief Financial Officer of American National Can Company, 8770 West Bryn Mawr Avenue, Chicago, Illinois 60631-3504. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Exhibit A.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1988.

EXHIBIT A

Plant Identification

1. Oakland Plant
3801 East 8th Street
Oakland, CA 94601
EPA ID # CAD 009162166
2. San Jose Plant
1598 S. First Street
San Jose, CA 95110
CPA ID # CAD 990768871



COMPANY CONFIDENTIAL

April 14, 1988

Regional Administrator
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

Dear Sir:

I am the Chief Financial Officer of American National Can Company, 8770 West Bryn Mawr Avenue, Chicago, Illinois 60631-3504. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Exhibit A.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.


The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

Part A. Liability Coverage for Accidental Occurrences

ALTERNATIVE I

1. Amount of annual aggregate liability coverage to be demonstrated	\$	<u>2,000,000.00</u>	
*2. Current assets	\$	<u>1,206,027,000.00</u>	
*3. Current liabilities	\$	<u>1,055,028,000.00</u>	
4. Net working capital (line 2 minus line 3)	\$	<u>150,999,000.00</u>	
*5. Tangible net worth	\$	<u>79,867,000.00</u>	
*6. If less than 90% of assets are located in the U.S., give total U.S. assets	\$	<u>2,590,586,000.00</u>	
		YES	NO
7. Is line 5 at least \$10 million?	<u>X</u>		<u> </u>
8. Is line 4 at least 6 times line 1?	<u>X</u>		<u> </u>
9. Is line 5 at least 6 times line 1?	<u>X</u>		<u> </u>
*10. Are at least 90% of assets located in the U.S.? If not, complete line 11.	<u> </u>		<u>X</u>
11. Is line 6 at least 6 times line 1?	<u>X</u>		<u> </u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



Walter T. Stelzel
Executive Vice President,
Chief Financial Officer and Treasurer

April 14, 1988

EXHIBIT A

<u>Plant Identification</u>	<u>Current Closure Cost Estimate</u>
1. Barrington Technical Center 433 N. Northwest Highway Barrington, Illinois 60010 EPA ID #ILD 047922323	\$ 9,000.00
2. Bellwood Plant 2400 Maywood Drive Bellwood, Illinois 60104 EPA ID # ILD 005142351	\$ 6,000.00
3. Des Moines Plant 1500 East Aurora Des Moines, Iowa 50316 EPA ID # IAD 001818327	\$400,000.00
4. Hoopeston Plant 324 W. Main Street Hoopeston, Illinois 60942 EPA ID # ILD 005462361	\$ 14,000.00
5. Lemoyne Plant 221 South Tenth Street Lemoyne, Pennsylvania 17043 EPA ID # PAD 003024551	\$141,000.00
6. Oakland Plant 3801 East 8th Street Oakland, California 94601 EPA ID # CAD 009162116	\$ 22,923.00
7. San Jose Plant 1598 S. First Street San Jose, California 95110 EPA ID # CAD 990768871	\$ 2,376.00



April 26, 1988

Regional Administrator
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, California 94105

5
9

RA/DRA	_____
Referred To	<u> I-7 </u>
CC:	_____
File:	_____

Re: Financial Assurance for Closure and Liability Coverage

Dear Sir:

In accordance with the requirements of 40 C.F.R. Part 265, Subpart G, we herewith submit the following to establish financial assurance for closure and liability coverage for the facilities of American National Can Company indicated on the attached Exhibit A:

1. Letter of Credit No. SDC-743-001488 issued by The Dai-Ichi Kangyo Bank, Ltd., dated April 26, 1988;
2. Standby Trust Fund Agreement; and
3. Letter from the chief financial officer for liability coverage, including supporting documents.

Any questions relative to any of the enclosed documents may be referred to Richard A. Kabaker, Esq. (312-399-3526), of this office, or to Timothy G. Rogers, Esq., of Cadwalader, Wickersham & Taft, 100 Maiden Lane, New York, New York 10038 (212-504-6832).

Very truly yours,

Dennis M. Byrd
Manager - Financial Services

DMB243/jcw

Enclosures

cc: R. Kabaker - ANCC
T. Rogers - Cadwalader
California Department of Health Services

EXHIBIT A

1. Oakland Plant
3801 East 8th Street
Oakland, California 94601
EPA ID #CAD 009162116
Assured Closure Funds: \$22,923.00

2. Sun Garden Plant
1598 S. First Street
San Jose, California 95110
EPA ID #CAD 990768871
Assured Closure Funds: \$ 2,376.00

-F-2

3/11

RA/DRA
Referred To <u>1-1</u>
CC: _____

American Can Company

Timothy G. Rogers
Assistant General Counsel

American Lane
P.O. Box 3610
Greenwich, Connecticut 06836 - 3610
203-552-3368

March 10, 1986

VIA FEDERAL EXPRESS

Regional Administrator
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Transfer of Facility Ownership

Dear Sir:

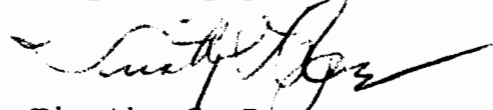
Pursuant to 40 C.F.R. §270.72(d), American Can Company
hereby notifies you that:

- (1) it currently owns and operates the facilities listed on the enclosed attachment;
- (2) it is in the process of establishing a wholly-owned subsidiary, American Can Packaging Inc.; and
- (3) ownership and operational control of the facilities listed on the enclosed attachment shall transfer to American Can Packaging Inc.

Upon completion of the transactions respecting this subsidiary, a revised Part A permit application will be filed by American Can Packaging Inc.

Any questions relative to this transfer should be directed to me.

Very truly yours,


Timothy G. Rogers

TGR/lg
Enclosure
/05891

*called called Rogers 7/2/86.
He said the change in owner/
operator is delayed until
the end of 1986. I told him
to send a copy of the revised
Part A to the state office.*

Cheryl

ATTACHMENT

Oakland Plant
3801 East 8th Street
P. O. Box 2092
Oakland, California 94604
Telephone No. (209) 562-4014
EPA Identification No. ~~none of 5/1/86~~

American Can Co.

3801 East 8th St.

Gen. TSD-5 (code)

? will be changed

CA0009162116

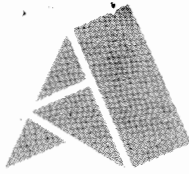
~~Sun Garden Plant~~
1598 South First Street
San Jose, California 95110
Telephone No. (408) 292-3507
EPA Identification No. CAD990768871

American Can Co.

1980-Gen TSD

Salem Plant
3334 Industrial Way, N. E.
P. O. Box 7107
Salem, Oregon 97303
Telephone No. (503) 585-5907
EPA Identification No. ORD009044520

Region 10



American Can Company

Procurement & Transportation Department

P.O. Box 2092
3801 E. 8th St.
Oakland, Calif. 94604

May 22, 1984

Environmental Protection Agency
215 Fremont St.
San Francisco, Ca. 94105

Subject: Exception Report

Gentlemen:

Attached is a copy of hazardous waste manifest number 83375156 dated April 23, 1984. This manifest was offered with a shipment of empty drums.

The transporter, who is also the recycler, refused to sign and accept the manifest with the shipment.

As of this date, we have not received our signed copy of the hazardous waste manifest from the treatment facility.

Very truly yours,

R. W. Timms, Mgr.
Transportation
Western Region

encl.

Please print or type with ELITE type (12 characters per inch).

STATE ID NUMBER

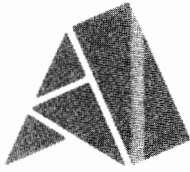
83375156

GENERATOR NAME AND MAILING ADDRESS AMERICAN CAN COMPANY-099 3801 EAST 8TH STREET OAKLAND, CALIFORNIA-94601 AREA CODE/PHONE NUMBER (415)-536-2400						MANIFEST DOCUMENT NUMBER CA000916211684011					
TRANSPORTER NO. 1 MYERS DRUM COMPANY 6549 SAN PABLO AVE. OAKLAND, CALIFORNIA-94608 (415) 271-6200						VEH./CONTAINER NO. 0000628		EPA ID NUMBER CA0009123211			
TRANSPORTER NO. 2/ALTERNATE TSD FACILITY						VEH./CONTAINER NO.		EPA ID NUMBER			
TREATMENT, STORAGE, OR DISPOSAL (TSD) FACILITY MYERS DRUM COMPANY 6549 SAN PABLO AVE. OAKLAND, CALIFORNIA-94608 AREA CODE/PHONE NUMBER (415) 271-6200						EPA ID NUMBER CA0009123211					
PROPER U.S. D.O.T. SHIPPING NAME AND HAZARD CLASS				UN/NA NUMBER	TOTAL QUANTITY	UNIT WT/VOL	CONTAINER NO.	WASTE CAT. NO.	DIS. MET		
EMPTY DRUMS 49CFR 173.29				UNQNE	08000	P	200DM	5120			
COMPONENTS						CONC. RANGE		UNITS			
						UPPER	LOWER	%	PPM		
Empty PAINT DRUMS						100					
Empty SOLVENT DRUMS						100					
SPECIAL HANDLING INSTRUCTIONS											
This is to certify that the above-named wastes are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable requirements of the Department of Transportation and the EPA.											
Printed or typed full name and signature HOLLINS L. MATTHEWS H. L. Matthews						MO.	DAY	YR.			
<input type="checkbox"/> Check if continuation sheet is used. Number of continuation sheets											
TRANSPORTER 1 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES						DATE REC'D & ACCEPTED	MO.	DAY	YR.		
Printed or typed full name and signature											
TRANSPORTER 2 ACKNOWLEDGEMENT OF RECEIPT OF ABOVE WASTES						DATE REC'D & ACCEPTED	MO.	DAY	YR.		
Printed or typed full name and signature											
DISCREPANCY INDICATION SPACE											
Facility owner or operator: Certification of receipt of hazardous waste covered by this manifest except as noted in the discrepancy indication space above. Note: TSDF must complete waste number. See instructions.						DATE RECEIVED & ACCEPTED					
Printed or typed full name and signature						EPA ID NUMBER	MO.	DAY	YR.		

TO BE FILLED IN BY GENERATOR

TO BE FILLED IN BY TRANSPORTER

TO BE FILLED IN BY TSDF



American Can Company

Therese Sathue
Manager, Solid Waste Compliance
Corporate Public Affairs

American Lane
Greenwich, Connecticut 06830
203-552-2181

November 24, 1980

EPA Region IX
Attn: A-3-2
215 Freemont Street
San Francisco, CA 94105

CADD009162116

RE: AMERICAN CAN COMPANY
3801 East 8th Street
P.O. Box 2092
Oakland, CA 94604

Dear Sir:

Our letter of November 14, 1980 attached a completed Form 1 and Form 3 to cover the hazardous waste storage at our Oakland facility.

Please find attached the topographic map that was missing in our original submittal.

Very truly yours,

AMERICAN CAN COMPANY

Therese Sathue

TS/pah
Attachment

cc: D. Fabrizio 099

CAD009162116



American Can Company

Therese Sathue
Manager Solid Waste Compliance
Corporate Public Affairs

American Lane
Greenwich, Connecticut 06830
203-552-2181

November 14, 1980

U.S. EPA Region IX

Attached is an Application for Hazardous Waste Permit for American Can
Company's plant/facility located at 3801 East 8th Street PO 2092
Oakland, CA. 946604

Missing information to be forwarded when available:

☒ EPA Identification Number

☒ Topographic Map

☐ Facility Photograph

Therese Sathue

Therese Sathue

TS/pah
Attachment

**RECORDS
SEPARATOR
PAGE**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

07 JUN 1984

CAD 009 162 116

REFERRAL LETTER

Richard P. Wilcoxon, Chief
 Division of Toxic Substances Control
 California Department of Health Services
 714 P Street
 Sacramento, CA 95814

Dear Mr Wilcoxon

EPA has recently received a Manifest Exception Report from American Can Company, Oakland, CA concerning a recent shipment of empty drums shipped on Manifest #83375156 dated April 23, 1984. This exception report was filed in accordance with 40 CFR 262.42.

Section II.B.2 of the Phase I Memorandum of Agreement (MOA) makes it the primary obligation of the State to take timely and appropriate action against persons in violation of generator, transporter and facility standards.

Please provide us with a copy of your compliance action, and all follow-up correspondence. Please record your compliance actions related to this case on your monthly inspection and compliance report.

If you have any questions or require additional information, please contact Paul D. Blais of my staff at (415) 974-8129.

Sincerely yours,

Original Signed by:

Phil Bobel
 Chief
 Toxics & Waste Programs Branch

Enclosure

cc: Tom Bailey, DOHS-HQ
 Gil Jensen, DOHS-HQ
 Dwight Hoenig, DOHS-Berkeley

bc Blais T-2-1			CONCURRENCES				
SYMBOL	Lehr, T-2-1	T-2-1					
SURNAME	Blais	Lehr					
DATE	6/6/84	6/6/84					

900809
ER
Date of action: 7/6/88

TSDf UNIVERSE CHANGES TO HWDMS

Facility ID: CAD 009162116

Facility Name: American National Can (Oakland)

Change field	Old value	New value	Reasoning/Documentation
<input type="checkbox"/> c303 Non-Regulated	—	S	
<input checked="" type="checkbox"/> c305 TSD Type	—	—	E
<input type="checkbox"/> c1103 TSD Notifier	—	—	
<input checked="" type="checkbox"/> c1105 Permit Status	5	2	
<input type="checkbox"/> c1101 Generator	—	—	
<input type="checkbox"/> c1102 Transporter	—	—	
<input type="checkbox"/> _____	—	—	

Acceptable forms of Evidence for authorizing changes:

- | | |
|-----------------------------|----------------------|
| (I) Inspection | (A) Part A |
| (E) EPA request | (P) Permit |
| (S) State agency request | (C) Closure permit |
| (L) Letter from 3rd party | C or L or W |
| (T) Turn around document | |

SUPPORTING DOCUMENTATION MUST BE ATTACHED AND FILED IN THE NOTIFICATION FILE.
If documentation is not attached, please explain why on the back of this form.

L. Lewis
Responsible Person

Date

900708jws

tsdctrl.frm



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

UNIVERSE CHANGES

Date Changed 6/30/88
7/6/88(dd)

Facility Name: American National Can - Oakland

Facility EPA ID #:

CAD009162116

Changes

FROM	TO	WHY/WHO
C1105 = S C305 = b/mk	C1105 = Z C305 = S	per L. Mlenar's 11/87 memo change request

Comments:

Supporting Documents Attached

☒

Yes

☐ No

If no, why not

Responsible Person:

L. Lewis T-28

1

5/88

HWDMS CHANGES

NOTIFICATION

EPA ID #
FAC. NAME

CAD009162116

AMERICAN CAN - ~~INDUSTRIAL~~

OAKLAND

AUTHORIZED BY: LETTER

DATE

WHO

NATIONAL

PERSON

7/86

Cheryl Lehr / Michael Feely

OLD

NEW

TSD STATUS (C305)

PERMIT STATUS (C1105)

5

2

HANDLER TYPES (C1101-C1103)

GENERATOR
TRANSPORTER
TSD:

Longman
11/29/87

ENTERED BY

DATE

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704

(415) 540-2043

CERTIFIED # P 368 413 438

June 8 , 1983



Mr. James Trish
Manager of Operations
American Can Company
3801 E. 8th Street
Oakland, California 94604

C-AD009 162116

Dear Mr. Trish:

On March 29, 1983 and April 13, 1983 an inspection of your facility was conducted by Barbara Barry and Chuck McLaughlin of the Hazardous Waste Management Branch.

Pursuant to Section 66328(c), California Administrative Code, you are hereby notified of the following conditions observed during the inspection which are alleged to be violations of the California Hazardous Waste Control Act (California Health and Safety Code, Division 20, Chapter 6.5) and California Hazardous Waste Control Regulations (California Administrative Code, Title 22, Division 4, Chapter 30), and the conditions of your Interim Status Document.

- 1) American Can Company is operating a transfer station which was not reported in the Part A application. As this operation is not covered by the Interim Status Document, it is being conducted without a Hazardous Waste Facility Permit in violation of Section 66370, CAC.
- 2) At the time of the inspection, American Can had some containers of waste which may have exceeded the one year time limit. Section 11,1(a) of the ISD.
- 3) Hazardous wastes are not being stored in a secure enclosure and no caution signs are posted on the area where the hazardous waste is stored. Caution signs must contain the prescribed warning and be posted to be visible from any direction of access. Section II,1(c), ISD.
- 4) The hazardous waste area for drums does not have an impervious base; neither storage area has contiguous bases or berms. Section 11,1(d), ISD.
- 5) Labels were not maintained on all containers which held wastes 90 days or more, as specified in the ISD. Sections 11,2(c)1-5, ISD.
- 6) Empty containers which held hazardous materials were not stored, handled, processed and disposed of as hazardous wastes. Section 11,2(d), ISD.

- 7) Neither the entire perimeter of the facility nor the hazardous waste areas are completely enclosed by a fence. Section II 7, ISD
- 8) There is no waste analysis plan as required by the Interim Status Document. Section III,3, ISD.
- 8a) The Hazardous Waste Analysis Plan shall contain procedures for analyzing all waste materials received to determine all information needed for proper handling. Section III,3(a)(1), ISD.
- 8b) Additional information to be used for the Waste Analysis Plan must be information on the same waste produced by similar processes. Material Safety Data Sheets on the virgin material may not be used for this purpose. Section III,3(a)(2), ISD.
- 8c) The plan shall include procedures for both updating the Waste Analysis Plan as needed as well as a schedule for periodic monitoring of data to determine consistency with established data. Section III,3(a)(3), ISD.
- 8d) The Waste Analysis Plan shall be followed by the facility from the effective date of the Interim Status Document (March 30, 1981) and the procedures shall be approved by the Department of Health Services, Hazardous Waste Management Branch. This plan shall be kept at the facility. Section III,3(b), ISD.
- 8e) The Waste Analysis Plan shall address the five major areas of concern as described in the Interim Status Document. Section III,3(b)(1-5).
- 9) Hazardous waste signs are not posted on the hazardous waste storage facilities. Section III,4(c).
- 10) There is no procedure for inspection of the hazardous waste area. Section III,5(a), ISD.
- 11) There is no written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment. The schedule has not been approved by the Department. The schedule should identify the frequency of inspection. Section III,5(b)(1-5), ISD.

- 12) There is no provision for remedial action approved by the Department. Section III,5(c), ISD.
- 13) There is no inspection log which is to be kept for three years as required by the Interim Status Document. Section III,5(d), ISD.
- 14) There is no formalized plan of classroom or on-the-job training as required in Section III, 6(a)(1), ISD.
- 15) There is no person in the hazardous waste program to implement the training program as required in Section III,6(a)(2), ISD.
- 15a) The training program should include the minimum training as outlined in Section III,6(a)(3), ISD.
- 16) Facility personnel have not yet been trained in a hazardous waste management training program as required, although they have received hazardous materials training. Section III,6(b), ISD.
- 17) Facility personnel do not take part in the annual review of training as required in Section III,6(c), ISD.
- 18) The job title and description for each position which handles hazardous waste must be in writing. In addition, the training required for each position must be in writing. All work experience and training should be thoroughly documented. Section III,6(d)(1-4).
- 19) Training records on every employee must be kept until closure of the facility or until three years after the employee terminates. Section III,e, ISD.
- 20) A berm needs to be constructed to prevent spills from leaving the property. Section III,8, ISD.
- 21) The facility has four plans already in operation, however, some of the requirements for the Contingency Plan are not included in the existing Spill Prevention Control and Countermeasure Plan for Oil and Hazardous Substances, Fire and Emergency Brigade Organization, Fire Prevention Plan, and Emergency Action Plan. Section III, 12(a), ISD.

The additional requirements must be added to the four above mentioned plans as indicated below:

- 21a) The actual agreements in writing need to be included. It is not sufficient to note that the police or fire department will respond. Section III,12(c), ISD.
- 21b) The names and addresses and phone numbers of persons filling job titles need to be added to the plan. Section III, 12(d), ISD.
- 21c) Specific equipment available for emergency use needs to be listed as well as the location, physical description and capabilities. Section III,12(e), ISD.
- 21d) A statement needs to be added to the Contingency Plan giving the times when ammendment is required. Section III,15, ISD.
- 21e) No emergency coordinator is named in any of the facility's plans or in the Operation Plan. Section III,16, ISD.
- 21f) The Emergency Action Plan needs to be ammended to name an Emergency Coordinator who wil also immediately notify the State Department of Health Services within 24 hours of an occurrence. Section III,17(a)(3), ISD.
- 21g) The plan needs to be redone to consolidate pertinent information so it can be found in an emergency. Section III,17(a), ISD.
- 22) A procedure needs to be developed for identifying and tracking hazardous wastes generated at your facility plus the wastes received in your capacity as a transfer station. Section IV,1(b)(2), ISD.
- 22a) The records and results of waste analyses and trial tests for both material generated on-site and as a transfer station should be included. Section IV,1(b)(3), ISD.
- 23) The records and results of inspections need to be kept three (3) years. Section IV,1(b)(5), ISD.
- 24) The Annual Report has not been submitted. Section IV,3(a-g), ISD.
- 25) Procedures for submission of special reports on releases, fires, explosions, groundwater contamination and monitoring data, and facility closure should be developed. Section IV,4(a-c), ISD.

- 26) The facility has no formalized written closure plan. Such a plan must be developed. Section V, 2(a)(1-4), ISD.
- 26a) The Closure Plan must include the minimum requirements listed in the Interim Status Document. Section V,2(a) (1-4), ISD.
- 26b) The Closure Plan must indicate when it must be revised. Section V,2(b), ISD.
- 26c) The Closure Plan must indicate that it will be submitted to the Department of Health Services, Hazardous Waste Management Branch 180 days prior to the start of closure. Section V,2(c), ISD revised.
- 26d) The Closure Plan must indicate that within 90 days of receipt of final volume of hazardous wastes they shall be treated, disposed of on-site or removed from the site to a proper disposal facility. Section V,3 (a), ISD.
- 26e) The Closure Plan must indicate that all closure activities must be completed within six months of receipt of the final volume of wastes unless an extension has been granted by the Hazardous Waste Management Branch. Section V,3(b), ISD revised.
- 26f) The closure plan shall address the decontamination of all facility equipment and structures or their proper disposal . Section V, 4, ISD.
- 26g) The closure plan shall make provisions for certification by both American Can and an independent registered professional engineer that the facility has been closed in accordance with the closure plan. Section V,5, ISD revised. This certification shall be submitted to the Hazardous Waste Management Branch.
- 27) The facility must make provisions for an annual update on the closure Cost Estimate. Section VI,1(c) ISD.
- 28) The facility shall inspect container storage areas as required by the ISD. Section VII,4,ISD.

Section 66328(d) C.A.C. states: "If corrections are needed, the operator shall provide to the Department a written plan of correction which states the actions to be taken and the expected dates of completion".

Mr. James Trish

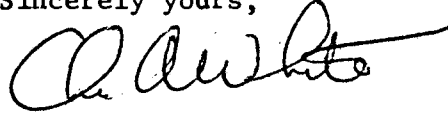
-6-

You are hereby directed to submit a Plan of Correction to this office, pursuant to Section 66328(d) C.A.C., which describes the steps you will take to correct these deficiencies. Your Plan of Correction must be received at this office within 30 days of the date of this letter.

Your attention is directed to Sections 25188, 25189, and 25191 of the California Hazardous Waste Control Law, which provide for civil and criminal penalties of up to \$25,000 per day per violation for violations of the California Hazardous Waste Control Law and Regulations, Hazardous Waste Facility Permit, or Interim Status Document.

If you have any questions concerning this matter please contact Barbara Barry of this office at (415) 540-2057.

Sincerely yours,



Charles A. White, P.E.,
Regional Administrator
Hazardous Waste Management Branch
North Coast Region

cc: ✓ Paul Blais,
U.S. EPA, Region IX

Harold Singer,
R W Q C B, Oakland

Gerald Winn, Director
Environmental Health Services
Alameda County

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

June 9, 1992

CERTIFIED MAIL

Mr. Joseph Moran
Assistant General Counsel-Environmental
American National Can Company
877 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Dear Mr. Moran:

**AMERICAN NATIONAL CAN COMPANY - 3801 EAST EIGHTH STREET, OAKLAND,
CALIFORNIA 94604 - EPA I.D. NO. CAD009162116**

This letter addresses three items that arose during the inspection by the California Environmental Protection Agency, Department of Toxic Substances Control (Department) on December 11, 1991. The three point are:

- Report of Violation submittals
- Amended Report of Violation to include Financial Responsibility review deficiencies
- Closure Report Review

Report of Violation submittals

The Department is in receipt of your submittals dated March 27, 1992 (letter) and April 28, 1992 (received by fax). These submittals were in response to the Report of Violation and Schedule of Compliance issued on February 13, 1992. The Department has reviewed your submittals and has determined that the above referenced facility is in compliance with the violations identified in the Report of Violation dated February 13, 1992.

Financial Review

The Department has received the results of a financial responsibility review which found that no financial assurance or liability coverage exists for the subject facility. The following additional violations are a result of that review:



Mr. Joseph Moran
Page Two
June 9, 1992

Additional Violations

11. Title 22, Cal. Code Regs., Section 66264.147(a).

On or about 2/5/92 American National Can Company, (ANCC) violated Title 22, Cal. Code Regs., Section 66264.147(a) in that ANCC failed to maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence per facility with an annual aggregate of at least \$2 million per facility, exclusive of legal defense costs.

12. Title 22, Cal. Code Regs., Section 66264.143.

On or about 2/5/92 ANCC violated Title 22, Cal. Code Regs., Section 66264.143 in that ANCC failed to establish and demonstrate to the Department financial assurance for closure of the facility.

Within 30 days please submit a response to the above violations to the Department.

Closure Report Review

Finally, the closure report dated November 21, 1991 submitted to the Department shows that two soil borings were taken (SB-14 and SB-16) from the area surrounding the wash shed. The analytical results (Attachment C of the Closure Report) show that the following samples were submitted for analyses:

SB-11 S-2	SB-11 S-5	SB-13A S-1	SB-13A S-4
SB-14 S-3	SB-14 S-6	SB-15 S-3	SB-15 S-6
SB-16 S-4	SB-16 S-7	SB-17 S-3	

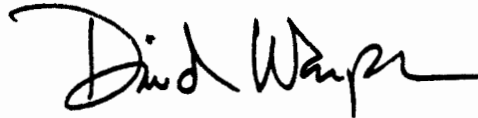
Nowhere in the discussion in the Closure Report was there a mention of the location and depth of the above samples. Only a map is provided showing two sample locations (SB-14 and SB-16). The letter from Alameda County Environmental Health dated April 17, 1991 indicated that, "analyses indicate no contamination resulting from the types of liquid waste stored in this area". What analyses is the letter referring to? Additionally, lab results provided in the closure report show that samples were analyzed following methods 8240 and 8270. Were analyses conducted to detect metals? And if so, what methods were used?

Pursuant to the Health and Safety Code Section 25185.6 the Department requests that American National Can Company submit clarification to the issues raised in the Closure Report.

Mr. Joseph Moran
Page Three
June 9, 1992

If you have any questions, please call Patricia Barni at
(510) 540-3861.

Sincerely,



David Wampler
Hazardous Materials Specialist
Surveillance & Enforcement Branch



Patricia Barni
Senior Hazardous Materials
Specialist
Surveillance & Enforcement Branch

Certified Mail No. P659118407

cc: See next page

Mr. Joseph Moran
Page Four
June 9, 1992

cc: Lily Wong - Mail Stop H-4-1
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, California 94105

Mr. Larry Matz
Surveillance and Enforcement
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mike Shepard
Toxics Legal Office
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Edgar Howell
Alameda County Department of
Environmental Health
Division of Hazardous Waste Management
80 Swan Way, Room 200
Oakland, California 94621

Ms. Judy Peters
Environmental Engineer
American National Can
8770 W. Bryn Mawr
Chicago, Illinois 60631

Leroy Smith
American National Can Company
3801 East Eighth Street
Oakland, California 94604

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704



CSC

December 4, 1986

James A. Long, Sr. Vice President
Mergers and Acquisition
American Can Company
American Lane, P.O. Box 3610
Greenwich, Connecticut 06836-3610

Dear Mr. Long:

TRANSFER OF FACILITY OWNERSHIP
CAD009162116 OAKLAND FACILITY
CAD990768871 SAN JOSE FACILITY

This acknowledges your letter of October 28, 1986 requesting a minor modification of the hazardous waste facility permits for the Oakland and the San Jose facilities to reflect change in ownership. We understand that effective on October 31, 1986 ownership and operational control of these permitted facilities have been transferred from American Can Company, a New Jersey Corporation to American Can Packaging Inc., a Delaware Corporation and wholly-owned subsidiary of Triangle Industries Inc.

The Department accepts minor modification of the permits. To reflect such permit amendments a copy of this letter will be included in our permit files. The Federal Environmental Protection Agency and the San Francisco Regional Water Quality Control Board will be advised of the ownership changes by copy of this letter.

Please send the Financial Assurance Documents to the attention of Ms. Iran Haefele at 714/744 "P" Street, Sacramento, CA 95814.

If you have any questions pertaining to this letter, please contact Sonia S. Low at (415) 540-2747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael R. James".

Michael R. James, Chief
Permit Unit Chief
North Coast California Section
Toxic Substances Control Division

cc: Timothy G. Rogers - American Can Co.
Mostafa Radmand - USEPA
Harold Singer - SFRWQCB
Iran Halfele - DOHS/Financial Assurance

MRJ:ssl:adc

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL DIVISION

NORTHERN CALIFORNIA SECTION

4250 POWER INN ROAD

SACRAMENTO, CA 95826

(916) 739-3145

RECEIVED
JUL 15 1985
REGIONAL
COMPL. DIV.



July 15, 1985

'85 JUL 18 10:12

Ms. Laura DeArmond
American Can Company
P.O. Box 2092
3801 E. 8th Street
Oakland, CA 94604

CAD009162116

Dear Ms. DeArmond:

WITHDRAWAL OF ISD DETERMINATION

The Department of Health Services has received your request to have your Interim Status Document (ISD) be no longer in effect, as the hazardous waste facility permit requirements no longer apply to your specified operation. An inspection of your facility, located in Lindsay, in February 1985 indicated the following:

- o Hazardous wastes are not stored on-site for more than 90 days.
- o Hazardous wastes are not received from off-site facilities.
- o Hazardous wastes are not treated on-site.
- o Hazardous wastes are not disposed of on-site.

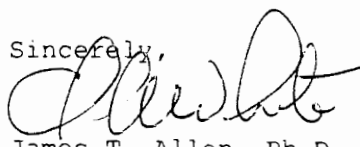
Based on this information, the Department hereby notifies you that your facility in Lindsay is not regulated as a treatment, storage or disposal facility under the State law and regulations as authorized by the Environmental Protection Agency according to the provisions of the Resource Conservation and Recovery Act. Therefore, your ISD is no longer in effect.

Please be advised that should you wish to operate a hazardous waste facility in the future, you will need to first obtain the facility permit prior to commencing operation. ISDs will not be reinstated.

Your company will still be a producer of hazardous waste and as such has the responsibility of handling those wastes properly (e.g., use of the manifest, use of registered hazardous waste hauler, etc.).

If you have any questions regarding this matter, please call Watson Gin of this office at (916) 739-2827.

Sincerely,


James T. Allen, Ph.D.
Chief, Northern California Section

cc: U.S. EPA, Region IX, San Francisco
Mr. John Masterman, DOHS-TSCD-PMS, Sacramento

AVE.

3

1 THOGRAPHING

Deer Creek
Oakland

